

LAW OFFICES OF RANDAL M. BARNUM
Randal M. Barnum, Bar No. 111287
rmblaw@pacbell.net
Carrie E. Croxall, Bar No. 190430
ccroxall@rmblaw.com
Lindsay R. Batcha, Bar No. 264192
lbatcha@rmblaw.com
279 East H Street
Benicia, California 94510
Telephone: (707) 745-3747
Facsimile: (707) 745-4580

Attorneys for Plaintiff
Karen A. Parks

SHAW VALENZA LLP
D. Gregory Valenza, Bar No. 161250
gvalenza@shawvalenza.com
980 Ninth Street, Suite 2300
Sacramento, California 95814
Telephone: (916) 326-5150
Facsimile: (916) 497-0708

Attorneys for Defendants
Kindred Healthcare, Inc., erroneously sued as
Kindred Healthcare Incorporated, and Professional
HealthCare at Home, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KAREN A. PARKS, an individual,

Plaintiff,

v.

KINDRED HEALTHCARE
INCORPORATED, PROFESSIONAL
HEALTHCARE at HOME, LLC, and Does
1-100, inclusive,

Defendants.

Case No. 4:15-cv-01788-SBA

**STIPULATION TO DISMISS THE
ENTIRE ACTION WITH PREJUDICE
[FED. R. CIV. PRO. 41(A)]; [~~PROPOSED~~]
ORDER**

1 IT IS HEREBY STIPULATED by and between the parties to this action through their
2 designated counsel that the above-captioned action be and hereby is dismissed with prejudice
3 pursuant to Fed. R. Civ. Pro. 41(a), each side to bear his or its own costs and attorney's fees.
4

5 SO STIPULATED.

6
7 Dated: February 23, 2016

Respectfully submitted,

8 LAW OFFICES OF RANDAL M. BARNUM
9

10 By: /s/Randal M. Barnum

11 Randal M. Barnum
12 Carrie E. Croxall
13 Lindsay R. Batcha
14 Attorneys for Plaintiff
15 Karen A. Parks

16
17 Dated: February 23, 2016

Respectfully submitted,

18 SHAW VALENZA LLP
19

20 By: /s/D. Gregory Valenza

21 D. Gregory Valenza
22 Attorneys for Defendants
23 Kindred Healthcare, Inc., and Professional
24 HealthCare at Home, LLC
25
26
27
28

Filer's Attestation

Pursuant to Civil Local Rules, rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of the document has been obtained from its signatory.

Dated: February 23, 2016

By: /s/D. Gregory Valenza

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 23, 2016.

Dated: February 23, 2016

By: /s/D. Gregory Valenza

PROPOSED ORDER

PURSUANT TO STIPULATION,

IT IS HEREBY ORDERED that the above entitled action and Plaintiff Karen A. Parks' First Amended Complaint in this matter are dismissed in its entirety with prejudice pursuant to Fed. R. Civ. Pro. 41(a).

IT IS FURTHER ORDERED that each party shall bear her or its own costs and attorney's fees.

DATED: February 23, 2016


United States District Judge
Saundra Brown Armstrong

438021.2.00133.117